

To 155 file  
**Environmental Protection Agency**

**4500 S. Sixth Street Springfield, IL. 62706**  
**Ph. (217) 786-6892**

February 4, 1982

Refer to: Peoria Co./LPC -- General  
Peoria/Bemis Company  
ILD #006215727

Bemis Company, Inc.  
Foot of Sloan Street  
Peoria, Illinois 61603

ATTENTION: Mr. Lawrence Rohman

Dear Mr. Rohman:

On November 12, 1981, you were contacted by telephone by a representative of the Illinois Environmental Protection Agency (IEPA). The conversation was conducted under the authorization of the United States Environmental Protection Agency (USEPA). The purpose of the telephone call was to obtain some background information concerning your facility's status with the Resource Conservation and Recovery Act (RCRA).

The conversation concluded that you appear to be a small quantity generator. Therefore, if you comply with the requirements of 40 CFR 261.5 you will be exempt from the other regulations under Parts 262 through 265, Parts 122 through 124 and the notification requirements of Section 3010 of RCRA. Should your status change in the future, please be advised that you would have to comply with Part 262 Standards Applicable to Generators of Hazardous Waste published in the Federal Register, Vol. 45, No. 98, on May 19, 1980, as amended.

Please confirm in a letter to us, within 15 days after receipt of this letter, whether you qualify under the special requirements for hazardous waste generated by small quantity generators under the provision of 40 CFR 261.5. Please send such documentation to Dorothy L. Jones at the above address.

Sincerely,

A handwritten signature in dark ink, appearing to read "MMN".

Monte M. Nienkerk  
Central Region Manager  
Land Field Operations Section  
Division of Land/Noise Pollution Control

MMN/DLJ/cp

cc: DLPC Division File  
DLPC/FOS, Central Region  
U.S.E.P.A./Region V

I. General Information:\*

(J) Person(s) interviewed	Title	Telephone
Lawrence Rohman	Plant Engineer	309/682-5406
(K) Inspection Participants	Agency/Title	Telephone
Dorothy L. Jones	I.E.P.A./EPS	217/786-6892
<i>Dorothy L. Jones</i>		
(L) Preparer Information		

Name	Agency/Title	Telephone
<u>Dorothy L. Jones</u>	I.E.P.A./EPS	217/786-6892

x  
28

	Yes	No	NI*	Remarks
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	—	—	—	—
6. The total quantity of waste(s) and the type and number of containers loaded?	—	—	—	—
7. Required certification?	—	—	—	—
8. Required signatures?	—	—	—	—
(C) Does the owner or operator submit exception reports when needed?	—	—	—	—

#### IV. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accord- ance with DOT regulations? (Required prior to movement of hazardous waste off-site)	—	—	—	—
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site)	—	—	—	—
(C) If required, are placards available to transporter?	—	—	—	—
(D) Pre-shipment Accumulation:				
1. Are containers marked with start of accumulation date?	—	—	—	—
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	—	—	—	—

\*Not Inspected

	Yes	No	NI*	Remarks
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from facility's property line)?	—	—	—	
4. If wastes are stored in tanks, are the tanks managed according to the following requirements:				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	—	—	—	
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	—	—	—	
c. Do continuous feed systems have a waste-feed cutoff?	—	—	—	
d. Are required daily and weekly inspections done?	—	—	—	
e. Are reactive and ignitable wastes in tanks protected from sources of reaction and ignition, or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements)	—	—	—	
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	—	—	—	
g. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?	—	—	—	

\*Not Inspected

Record the following information:

Tank capacity? \_\_\_\_\_ gallons

Tank diameter? \_\_\_\_\_ feet

Distance of tank from property line? \_\_\_\_\_ feet

(see tables 2-1 through 2-6 of NEPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance)

W Training, Emergency Procedures

	YES	NO	NI*	Remarks
A. Do Personnel training records include: (Effective 5/19/81)				
1. Job Titles?	_____	_____	_____	_____
2. Job Descriptions?	_____	_____	_____	_____
3. Description of training?	_____	_____	_____	_____
4. Records of training?	_____	_____	_____	_____
5. Have facility personnel received required training by 5-19-81?	_____	_____	_____	_____
6. Do new personnel receive required training within six months?	_____	_____	_____	_____
B. Preparedness and Prevention (Part 265, Subpart C)				
1. Maintenance and Operation of Facility:	_____	_____	_____	_____
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	_____	_____	_____	_____

2. If required, does this facility have the following equipment?

- a. Internal communications or alarm systems?
- b. Telephone or 2-way Radios at the scene of operations?
- c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

Indicate the volume of water and/or foam available for fire control

3. Testing and Maintenance of Emergency Equipment:

- a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
- b. Is emergency equipment maintained in operable condition?

4. Has owner/operator provided immediate access to internal alarms (if needed)?

5. Is there adequate aisle space for unobstructed movement?

C. Contingency Plan and Emergency Procedure  
(Part 265, Subpart D)

1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part as applicable)

b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?

c. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.

2. Are copies of the Contingency Plan,  
available at site and local  
emergency organizations?

3. Emergency Coordinator

a. Is the facility emergency  
Coordinator identified?

b. Is coordinator familiar with  
all aspects of site operation  
and emergency procedures?

c. Does the Emergency Coordinator  
have the authority to carry  
out the Contingency Plan?

4. Emergency

If an emergency situation has  
occured at this facility, has  
the emergency coordinator followed  
the emergency procdures listed in  
§265.56?

VI. RECORDKEEPING AND REPORTING  
(Part 262, Subpart D)

(A) Are Manifests, Annual Reports,  
Exception Reports, and all test  
results and analyses retained for  
at least three years?

(B) Has the generator submitted Annual  
Reports and Exception Reports as  
required?

VII. INTERNATIONAL SHIPMENTS  
(Part 262 Subpart E)

(A) Has the installation imported or  
exported hazardous waste?



(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste,  
has a generator:

a. Notified the Administrator  
in writing? \_\_\_\_\_

b. Obtained the signature of the -  
foreign consignee confirming  
delivery of the waste(s) in the  
foreign country? \_\_\_\_\_

c. Met the Manifest requirements? \_\_\_\_\_

2. Importing Hazardous Waste,  
has the generator:

Met the manifest requirements? \_\_\_\_\_

VIII. Remarks

REMARKS: \_\_\_\_\_

## OBSERVATION REPORT - SITE INVENTORY NO. GENERAL

(11)

(18)

PEORIA

CO. - L.P.C.

Region #

Date

(20)

(25)

Letter Sent (Yes or No)

(26)

PEORIA

BENIS Co. Inc.

(Location)

(Responsible Party)

Samples Taken: Yes ( ) No (✓)

Time: From 01:00P m

Weather

N/A

Ground Water ( ) Surface ( ) Other ( )

To 01:30P m

Photos Taken: Yes ( ) No (✓)

Interviewed LAWRENCE ROHMAN Inspector

(27)

(29)

Previous Inspection

Previous Correspondence

Site Open: Yes (✓) No ( )

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating (✓)

Landfill ( )

Storage ( )

E.P.A. Permit ( )

Temporarily Closed ( )

Random Dump ( )

Salvage ( )

Variance ( )

Closed Not Covered ( )

Other GENERATOR (✓)

A.C.D. ( )

21(e) ( )

Closed and Covered ( )

Quantity Received Daily (1-6)

(30)

Board Order ( )

Illegal (5) ( )

(31)

IMPROVED

LPC 4 1/79 5,000

SAME

DETERIORATED

I S or D

(62)

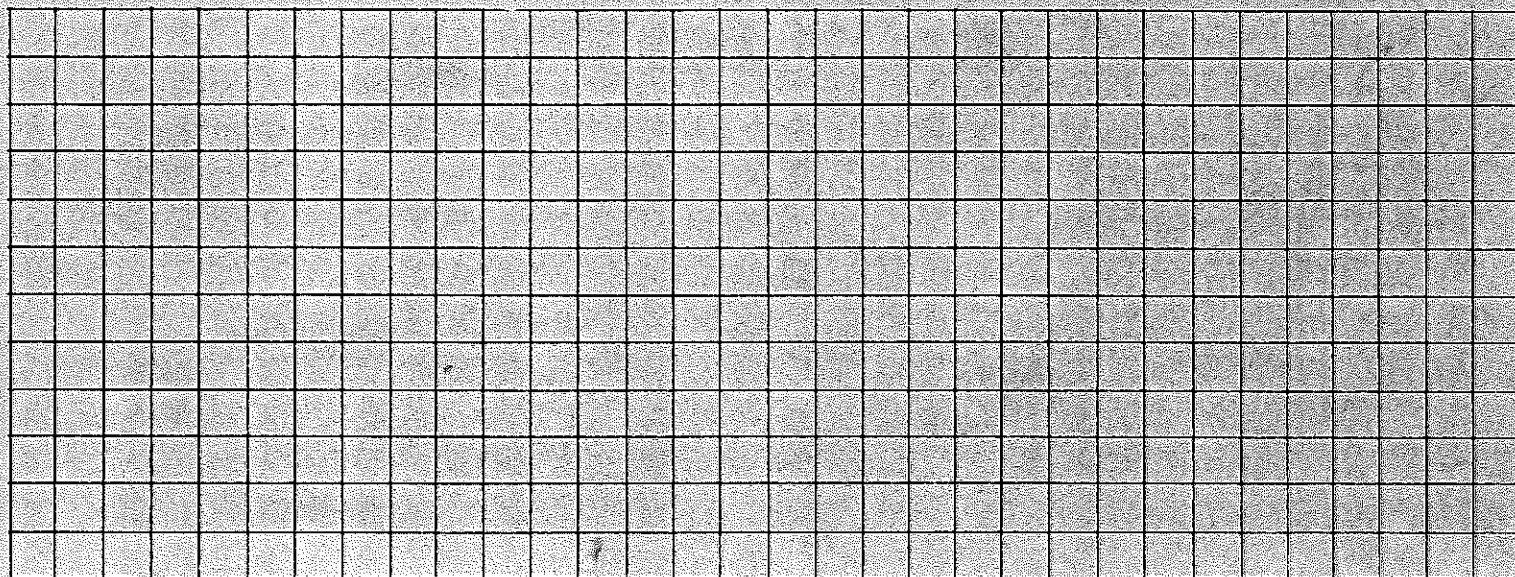
## GENERAL REMARKS:

Bemis Co. Inc. was contacted by telephone on 11/12/81 to obtain information regarding waste type & quantity. Facility is operating Tetrachloroethylene & 1,1,1-trichloroethane as cleaning solvent. The waste is stored in 55 gal drums in the volume of 4 barrels per. Waste must be removed to the hauler & disposed of the solvent. Some waste is recycled. and is considered a small quantity generator.

## INTERVIEW:

Facility should be contacted in a year to verify that they are still dealing in small quantities.

## DIAGRAM:



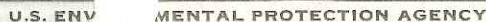
## II. BRIEFLY DESCRIBE SITE ACTIVITY

Bemis Co., Inc. was contacted by telephone on November 12, 1981, to obtain information regarding waste type and quantity. Facility is generating tetrachloroethylene and 1,1,1-trichloroethane as cleaning solvents used to treat paper bags. The waste is stored in 55-gallon drums in the volume of 4 barrels/yr. This calculates to 1,760 gal./yr. or 800 kg/yr. Waste Management of Peoria is the hauler and disposer of the solvent. Some of the waste is recycled. This facility is considered a small quantity generator. Facility should be contacted in a year to verify that they are still dealing in small quantities.

## III. MANIFEST REQUIREMENTS (Subpart B)

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	—	—	—	—
(B) Do the manifest forms reviewed contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements)				
1. Manifest document number?	—	—	—	—
2. Name, mailing address, telephone number, and EPA ID number of generator?	—	—	—	—
3. Name and EPA ID Number of transporter(s)?	—	—	—	—
4. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	—	—	—	—





**INSTRUCTIONS:** If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

TSD deleted Im Q code 2 added  
 1LD 006215727<sup>3</sup> -9-82  
 MGP

PLEASE PLACE LABEL IN THIS SPACE

001052 AUG 19 80

### III LOCATION OF INSTALLATION

## COMMENTS

[illegible]

INSTALLATION'S EPA I.D. NUMBER								APPROVED		DATE RECEIVED (yr., mo., & day)	
S	I	L	D	0	6	2	1	T/A	C		
F	I	L	0	0	6	2	1	A	J	8	0
										0	8
										1	8

I. NAME OF INSTALLATION

[illegible]

## II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX														
C														
3	P	.	O	.	B	O	X	5	6	8				

CITY OR TOWN													ST.		ZIP CODE						
C																					
4	P	E	O	R	I	A									I	L	6	1	6	5	1
15	16														40	41	42	43			51

### III. LOCATION OF INSTALLATION

[illegible]

CITY OR TOWN													ST.	ZIP CODE				
C													IL	6	1	6	0	3
6	P	E	O	R	I	A							IL	6	1	6	0	3

#### IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)													PHONE NO. (area code & no.)																							
C																																				
2	R	O	H	M	A	N	L	A	W	R	E	N	C	E	M	I	L	L	E	N	G	I	N	E	E	R	3	0	9	6	8	2	5	4	0	6
AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS	AS		

## V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

[illegible]

**B. TYPE OF OWNERSHIP**  
(enter the appropriate letter into box)

F = FEDERAL  
M = NON-FEDERAL

F = FEDERAL	M
M = NON-FEDERAL	56

**X A. GENERATION**

☒ C. TREAT/STORE/DISPOSE☐ **B. TRANSPORTATION** (complete item VII)☐ D. UNDERGROUND INJECTION

**VII. MODE OF TRANSPORTATION** (transporters only – enter “X” in the appropriate box(es))

☐ 61 A. AIR      ☐ 62 B. RAIL      ☐ 63 C. HIGHWAY      ☐ 64 D. WATER      ☐ 65 E. OTHER (specify):

### VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

C. INSTALLATION'S EPA I.D. NO.

### ☒ A. FIRST NOTIFICATION

☐ **B. SUBSEQUENT NOTIFICATION** (complete item C)

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

**AUG 18 1980**

**CONTINUE ON REVERSE**

S	W	IND	0062152172	7/A	C
1	2	3	4	5	6

## IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F002 23 - 26	2 F003 23 - 26	3 23 - 26	4 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 23 - 26	32 23 - 26	33 23 - 26	34 23 - 26	35 23 - 26	36 23 - 26
37 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

<input type="checkbox"/> 1. IGNITABLE (D001)	<input type="checkbox"/> 2. CORROSIVE (D002)	<input type="checkbox"/> 3. REACTIVE (D003)	<input checked="" type="checkbox"/> 4. TOXIC (D000)
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## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

Thomas P. Calbos

NAME &amp; OFFICIAL TITLE (type or print)

THOMAS P. CALBOS - PLT MGR

DATE SIGNED

8/15/80



LPC/General - Peoria Co. - Peoria Bemis

RECEIVED  
EPC/NPC

ILD 006215727

9 TSD

FEB 16 1982

**BEMIS COMPANY, INC.**

**BEMIS**

P.O. BOX 568  
PEORIA, ILLINOIS 61651  
TELEPHONE: (309) 682-5406  
TELEX: 404-414

STATE OF ILLINOIS

RECEIVED

FEB 22 1982

February 15, 1982

WASTE MANAGEMENT BRANCH  
EPA, REGION V

TSD deleted  
Sm Qty Code 2 added  
3-9-82 MGP

Illinois Environmental Protection Agency  
4500 S. Sixth St.  
Springfield, IL 62706

Attn: Dorothy L. Jones

Dear Ms. Jones,

Last week, I received a letter from Mr. Nienkerk concerning our status as a small quantity generator. After reviewing our current conditions and the criteria set forth in Mr. Nienkerk's letter, I believe that we do qualify as being a small quantity generator. If in the future, our operation changes which could possibly jeopardize our current status, I will notify your office. In his letter, he requested that our reply be directed to your attention.

Thank you.

Sincerely,

BEMIS COMPANY, INC.

*Lawrence J. Rohman*

Lawrence J. Rohman  
Plant Engineer

gjb

RECEIVED  
3/05/82

*file*

**BEMIS COMPANY, INC.**

**BEMIS**

P. O. BOX 568  
PEORIA, ILLINOIS 61651  
TELEPHONE: (309) 682-5406  
TELEX: 404-414

October 20, 1980

EPA Region V  
RCRA Activities  
P.O. Box 7861  
Chicago, IL 60680

Gentlemen:

On August 15, I submitted a completed EPA form 8700-12 (6-80) which is "Notification of Hazardous Waste Activity" form for Bemis Company, Inc., Peoria, Illinois. In section VI, I checked only box "A" which is for generation of a hazardous waste. Since there is a possibility that some storage of a hazardous waste may be necessary, I believe that box "C. Treat/Store/Dispose" should also be checked.

I hope that this letter is sufficient to change our initial filing for notification of a hazardous waste activity. If this is insufficient, please notify me what steps need be taken to correct this oversight.

Sincerely,

BEMIS COMPANY, INC.

*Lawrence Rohman*

Lawrence Rohman  
Plant Engineer-Mill

gjb

OCT 20 1980

140 00 621 5727



This is recycled paper